

Noah Horst, OSB No. 076089

Email: noah@lmhlegal.com

Ethan Levi, OSB No. 994255

Email: ethan@lmhlegal.com

Norah Van Dusen, OSB No. 180114

Email: norah@lmhlegal.com

Levi Merrithew Horst PC

610 SW Alder Street, Suite 415

Portland, Oregon 97205

Telephone: (971) 229-1241

Facsimile: (971) 544-7092

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH DAVID EMERSON,

Defendant.

Case No. 3:23-mj-00185

**UNOPPOSED MOTION TO
CONTINUE GRAND JURY REPORT
AND ARRAIGNMENT DATE**

Comes now Defendant Joseph David Emerson, by and through his attorneys, Noah Horst, Ethan Levi, and Norah Van Dusen, and moves this Court for an Order to Continue the Grand Jury report due date and arraignment date beyond 30 days. The current report due date is April 30, 2024, and the parties would like to continue the due date and arraignment to June 25, 2024.

I have discussed with Mr. Emerson his right to be indicted within 30 days of his arrest under 18 U.S.C. § 3161(b). Mr. Emerson understands his rights and knowingly waives his right to be arraigned within 30 days.

Mr. Emerson is presently out-of-custody.

The Assistant United States Attorney assigned to this matter, Parakram Singh, does not oppose this motion to continue.

DATED this 26th day of April, 2024.

By: s/ Ethan Levi
Ethan Levi, OSB No. 994255
Of Attorneys for Defendant